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International Business Machines Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

(SAN JOSE DIVISION)

MARY HELEN WOODSON,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION and DOES ONE through
TWENTY, Inclusive,

Defendant.

CASE NO. C 05-03387 JF (PVT)

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
FILE RESPONSE TO THIRD AMENDED
COMPLAINT AFTER CONSOLIDATION**

WHEREAS, on March 13, 2008, the parties executed a stipulation extending the deadline for IBM to file its response to plaintiff's Third Amended Complaint After Consolidation to March 28, 2008 because the parties were in settlement negotiations;

WHEREAS, on March 21, 2008, the Court issued a thirty day stay to allow the parties time to finalize a settlement agreement and scheduled a Case Management Conference for April 18, 2008;

WHEREAS, the parties are in continuing negotiation regarding the final language of the settlement documentation;

1 WHEREAS, on April 17, 2008, the Court issued a Clerk's Notice continuing the April 18,
2 2008 Case Management Conference until May 9, 2008 at 10:30 a.m. to allow the parties additional
3 time to finalize the settlement documentation;

4 WHEREAS, the parties agree that an extension of time for IBM to file its response to
5 plaintiff's Third Amended Complaint After Consolidation would provide them the time to finalize
6 the settlement agreement and avoid any unnecessary increase in litigation costs that might affect
7 the possibility of settlement; and

8 WHEREAS, due to the prolonged settlement discussions, the parties have entered into five
9 prior stipulations regarding extensions of time for IBM's response to Plaintiff's Third Amended
10 Complaint After Consolidation, most recently on March 13, 2008, the purpose of which was to
11 allow the parties time to negotiate a settlement and then draft settlement documentation;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, that
13 IBM's response to Plaintiff's Third Amended Complaint After Consolidation shall be due on or
14 before May 23, 2008.

15 Dated: April 17, 2008

MARY HELEN WOODSON

17 By /s/ Mary Helen Woodson
Mary Helen Woodson

19 Dated: April 17, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

22 By /s/ Scott G. Lawson
Scott G. Lawson
23 Attorneys for Defendant
International Business Machines Corporation

24 **Order**

25 Pursuant to the foregoing stipulation between the parties, IT IS SO ORDERED.

27 Dated: 4/21/08

28 
Jeremy Fogel
United States District Judge

Signature Attestation

I hereby attest that Plaintiff Mary Helen Woodson read and agreed to the above
**STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE
RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** and gave
Quinn Emanuel permission to sign and file the stipulation on her behalf.

Dated: April 17, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

By /s/ Andrea Pallios Roberts

Andrea Pallios Roberts
Attorneys for Defendant
International Business Machines Corporation

CERTIFICATE OF SERVICE

I am employed in the County of San Mateo, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065-2139.

On **April 17, 2008**, I served true copies of the following document(s) described as **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** on the parties in this action as follows:

BY MAIL: On **April 17, 2008**, I enclosed the foregoing into sealed envelope(s) addressed as shown above, and I deposited such envelope(s) in the mail at Redwood Shores, California. The envelope was mailed with postage thereon fully prepaid.

BY ELECTRONIC MAIL TRANSMISSION: By electronic mail transmission from andreaproberts@quinnemanuel.com on **April 17, 2008**, by transmitting a PDF format copy of such document(s) to each such person at the e-mail address listed below their address(es). The document(s) was/were transmitted by electronic transmission and such transmission was reported as complete and without error.

Mary Helen Woodson
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helenwoodson@gmail.com

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **April 17, 2008**, at Redwood Shores, California.

/s/ Andrea Pallios Roberts
Andrea Pallios Roberts